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1 **IT IS HEREBY STIPULATED** by and between Plaintiff Albert Dytch and
2 Defendant, Namastey Patio LLC and Shu Chen Chang, as Trustee of the Hong Chi Chang and
3 Shu Chen Chang Revocable Living Trust (collectively “Defendants”), the parties to this action,
4 that pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the action be dismissed with
5 prejudice, except that the Court shall retain jurisdiction to enter a stipulated judgment in the
6 event Defendants default on their payment obligations under the parties’ settlement agreement.
7 Each party is to bear its own attorneys’ fees and costs.

8
9 Dated: August 30, 2024

MOORE LAW FIRM, P.C.

10 /s/ Tanya E. Moore

11 Tanya E. Moore
12 Attorney for Plaintiff,
13 Albert Dytch

14 Dated: September 7, 2024

IRONHORSE LAW GROUP, P.C.

15 /s/ Nathan L. Scheg

16 Nathan L. Scheg
17 Attorneys for Defendants,
18 Namastey Patio LLC and Shu Chen Chang, as
19 Trustee of the Hong Chi Chang and Shu Chen
20 Chang Revocable Living Trust

21 **ATTESTATION**

22 Concurrence in the filing of this document has been obtained from each of the individual(s)
23 whose electronic signature is attributed above.

24 /s/ Tanya E. Moore

25 Tanya E. Moore
26 Attorney for Plaintiff,
27 Albert Dytch

28 Dated: September 9, 2024



STIPULATION FOR DISMISSAL OF ACTION